

Centre for Accessible Environments comments

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [GG1](#)

Principles are welcomed.

Page: [Policy GG3 Creating a healthy city](#)

Section: [GG3](#)

Principles are welcomed.

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: [1.4.2](#)

Principle is welcomed.

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: [GG4](#)

GG4C specifically welcomed.

Page: [Policy GG5 Growing a good economy](#)

Section: [GG5](#)

GG5 D should include references to providing inclusive/accessible working environments to align with housing policies and encourage continued mixed communities. This also increases marketing opportunities for inclusion within the workplace.

Page: [Policy D1 London's form and characteristics](#)

Section: [3.1.5](#)

Measures to design out crime should be considered early in the design process and where possible should not compromise access or inclusive design. This statement is welcomed and ongoing dialogue should be required throughout the design, build and management of the development.

Page: [Policy D2 Delivering good design](#)

Section: [D2](#)

Support - Principles A-H are welcomed and clearly set out.

Principles D – H: Clarification to be provided regarding timescales and content of good practice guidance regarding design analysis, design quality, level of detail required, design scrutiny (design and access statements, design reviews, design quality, design codes etc). Will support and training be available for the boroughs? Who will produce this guidance and will relevant qualified personnel and disabled people be involved in its publication etc? Boroughs should be encouraged to employ inclusive design/access experts such as access officers, housing occupational therapists.

H.1 Sufficient level of detail is welcomed, particularly in terms of specific property layouts complying with ADM requirements.

H.2 Ensuring the wording of planning permissions and associated conditions and legal agreements and providing clarity regarding the quality of design is welcomed. Consideration should be given to marketing of design features e.g. Category 2 and 3, and labelling so that purchasers are aware of the beneficial features. Also regarding Category 3 units and marketing of those provided in the private sector (and part-rent part-buy). Some boroughs include planning conditions that require private wheelchair units are marketed as such for 6 months and in a specific, relevant way. Thought possibly to including floorplans in marketing material (adaptable and accessible layouts), labelling, and information in title deeds to ensure future identification of these units.

Page: [Policy D2 Delivering good design](#)

Section: [3.2.5](#)

Support - This is welcomed but clarification will be required by LA's what is 'an agreed format'.

Page: [Policy D2 Delivering good design](#)

Section: [3.2.6](#)

Neutral - This should include experts from a range of disciplines who have an in-depth understanding of inclusive and accessible design. Is guidance available on what their role entails and how they will get involved? The involvement of disabled people is also important.

Page: [Policy D2 Delivering good design](#)

Section: [3.2.9](#)

Support - Welcomed. It would be helpful to refer to ADM, M4(3) Category 3 and requirement to provide furnished layouts.

Page: [Policy D2 Delivering good design](#)

Section: [3.2.10](#)

Support - This is welcomed and should be endorsed wherever possible.

Page: [Policy D3 Inclusive design](#)

Section: [D3](#)

A and B are welcomed.

Will detailed guidance be provided and referenced?

Page: [Policy D3 Inclusive design](#)

Section: [3.3.3](#)

Would suggest that those involved in design liaise with Design Out Crime Officers throughout period of design, build and post occupancy/management.

Page: [Policy D3 Inclusive design](#)

Section: [3.3.5](#)

The request for fire evacuation lifts and management plans is welcomed and should be clarified that it also applies to housing development (to repeat in D5 Accessible Housing). It would also be beneficial to provide a cost comparison demonstrating minimal additional cost, in addition to the additional overarching benefits (including increased confidence for disabled residents).

Page: [Policy D3 Inclusive design](#)

Section: [3.3.7](#)

Planning applications should ensure that planning conditions are placed on each development which comply with, and clearly detail, relevant Building Regulations and the 2016 Minor Alterations to the London Plan i.e. ADM, Volume 1: Dwellings; Minimum 90% for M4(2) Category 2 and 10% for M4(3) Category 3 (possibly more for certain types of housing or developments) across all tenure, and ADM Volume 2 for other areas – as per Policy D5 Accessible Housing.

Page: [Policy D3 Inclusive design](#)

Section: [3.3.8](#)

How will this be implemented and by whom? Relevant qualified personnel should be involved.

Page: [Policy D4 Housing quality and standards](#)

Section: [N/A](#)

There is no mention of accessible housing in this section or even a cross reference to D5.

This indicates that the Mayor will produce guidance on the implementation of this policy for all housing tenures. What form will this take and when will it be provided?

It should be noted that some aspects of this section do not apply to M4(3) Category 3: Wheelchair user dwellings which will require additional circulation, space standards etc. This should be noted on Table 3.1 and against point D4 - D.

Page: [Policy D5 Accessible housing](#)

Section: [D5](#)

Welcomed. In some developments/types of housing provision of M4(3) Category 3 should exceed 10% e.g. older persons housing, specialist housing for younger adults with a range of impairments.

Some Local Authorities may require more than 10% M4(3) Category 3, based on levels of existing provision.

Page: [Policy D5 Accessible housing](#)

Section: [3.5.3](#)

This is welcomed, as opposed to trying to put all the wheelchair units on the ground floor. Boroughs are reporting that disabled residents, whilst they may wish to reside above the ground floor e.g. for security/outlook etc, are refusing such flats where there is only single lift provision. Wording should therefore be added which encourages the provision of 2 lifts where at all possible and/or alternative access to secondary lifts e.g. routes through to another core in the event of lift breakdown/servicing and as a minimum 24 hr lift breakdown call out (robust management plans).

Page: [Policy D5 Accessible housing](#)

Section: [3.5.6](#)

This appears to be a backward step to the wording in the MALP which was much more around the requirement to provide a lift and provide viable evidence where this could not be done.

Page: [Policy D10 Safety, security and resilience to emergency](#)

Section: [3.10.3](#)

This should specifically refer to adopting an inclusive design approach and that measures should, where at all possible, not compromise access, with liaison between relevant stakeholders throughout whole of design and development/management process.

Page: [Policy D11 Fire safety](#)

Section: [D11](#)

A.3 and D. Welcomed

Page: [Policy D11 Fire safety](#)

Section: [3.11.4](#)

Welcomed.

Page: [Policy H2 Small sites](#)

Section: [H2](#)

Surely if there are 10 units then at least one should be M4(3) Category 3: Wheelchair user dwelling as per the MALP 10% requirement but also as per Policy D5 above – “at least” 10 per cent.

Can this be worded so that it indicates this is only relevant where it is not possible to provide a lift, as some small high end developments may install a lift.

Page: [Policy H2 Small sites](#)

Section: [4.2.6](#)

When will these guides/principles/codes be published and by whom? Will training and CPD be available for boroughs, and the encouragement of the employment of access professionals such as access officers, housing occupational therapists.

Page: [Policy H2 Small sites](#)

Section: [Table 4.2](#)

This table indicates the potential small sites and therefore inaccessible housing. Over the next ten years that is 10% of 245,730 housing target (Table 4.2) of which most will not be built to M4(2) or M4(3) which may have a significant impact on the overall housing stock accessibility.

Page: [Policy H2 Small sites](#)

Section: [4.2.13](#)

This should be clearly and robustly evidenced, as should the requirement for boroughs to have an identified programme through which additional affordable homes will still be delivered.

Page: [Policy H14 Supported and specialised accommodation](#)

Section: [H14](#)

This is welcomed.

Policy H15 Specialist older persons housing A.1-3, B. 1-5 and C helpfully refer specifically to accessible housing policies and relevant additional requirements. These should also be referred to in this section, including percentages of M4(2) and M4(3) which can be overlooked, particularly in light of A.4. Boroughs should be encouraged to identify local need for these housing types.

Page: [Policy H17 Purpose-built student accommodation](#)

Section: [N/A](#)

Object -

There is no mention of inclusive design principles and requirements in terms of providing accessible student accommodation – not just the rooms but site layout, approach, communal areas, disabled parking etc (ADM Volume 2 and BS8300). Accessible accommodation should also be encouraged across the range of provision e.g. not just individual flats but those with bedrooms and shared living facilities and should identify that shared facilities (such as kitchens) need to incorporate appropriate facilities.

Page: [Policy H18 Large-scale purpose-built shared living](#)

Section: [N/A](#)

Object -

No information is contained on whether these type of dwellings would be accessible to disabled people wishing to work and live independently as part of a shared community (different from supported living). Would these type of dwellings meet some of the requirements of M4(2) and M4(3) dwellings?

Page: [Policy H15 Specialist older persons housing](#)

Section: [N/A](#)

This is welcomed in clarifying requirements for sheltered and extra care housing (classified as C3 Housing), as well as additional relevant aspects such as safe storage and charging facilities for mobility scooters and pick up and drop off facilities close to the entrance. This is particularly helpful as policies and HAPPI requirements are vague in terms of design requirements for sheltered and extra care i.e. M4(2) and M4(3) and theoretically M4(3) requirements should be greater than 10%. Some retirement housing providers and/or boroughs are unclear about what is required despite the housing being for older people (i.e. those who will acquire additional impairments so require increasingly accessible properties and more space/circulation), and default to only providing M4(2). It would also be helpful to clarify that where there is a common approach to M4(3) and M4(2) dwellings, the requirements default to the higher requirement. Developers don't always apply this to external access/site layout/parking and approach etc.

4.15.3 & 4.15.10: Residential or nursing care accommodation (including end of life/hospice and dementia care home accommodation) - It may be helpful to clarify what regulation and design guidance applies in this context to avoid confusion.

Page: [Policy S2 Health and social care facilities](#)

Section: [N/A](#)

C refers to facilities being accessible by public transport, cycling and walking however there is nothing specifically referring to the principles of inclusive design and access to enable a wide range of users to easily access facilities (similar wording to S3 B.7). Reference should be given to high quality, accessible design guidance and good practice e.g BS8330, Health Building Notes etc.

5.2.4, 5.2.5., 5.2.6, 5.2.7 STPs – reference to these is welcomed, including Health and Wellbeing Boards and liaising with key stakeholders in terms of informing Development Plans etc. However there appears to be no reference to the need to include Housing, Planning and Development in discussions. Research undertaken by Care & Repair showed that virtually no STP's meaningfully refer to the inclusion of housing despite its key relationship to health and wellbeing and hospital admissions, delayed discharge etc.

Page: [Policy S3 Education and childcare facilities](#)

Section: [S3](#)

B.7 This is welcomed however there is no other detail/wording provided to underpin and encourage accessible and inclusive design, despite specific reference to SEN and SEND provision, innovative design solutions etc, nor reference to specific design guidance, good practice or relevant organisations etc. Changing Places provision should be encouraged.

Page: [Policy S4 Play and informal recreation](#)

Section: [N/A](#)

There are no specific references throughout this section to inclusive and accessible design and its importance in underpinning these facilities, nor reference to specific design guidance, good practice, or relevant organisations. Changing Places provision should be encouraged.

Page: [Policy S5 Sports and recreation facilities](#)

Section: [N/A](#)

There are no specific references throughout this section to inclusive and accessible design and its importance in underpinning these facilities, nor reference to specific design guidance, good practice, or relevant organisations. Changing Places provision should be encouraged.

Page: [Policy S6 Public toilets](#)

Section: [N/A](#)

This section is welcomed including references to a range of toilet facilities: unisex accessible toilets, separate accessible baby change/family toilets, cubicles for people with ambulant mobility impairments, consideration to gender neutral toilets and Changing Places toilets in addition to standard unisex accessible toilets.

It would be useful to clarify what a 'larger development' is for Changing Places toilets.

Page: [Policy T6.1 Residential parking](#)

Section: [T6.1](#)

H.5 refers to BS8300 which doesn't apply to housing. This should be clarified.